

EXHIBIT M

Dr. Stacey Desamours

Page 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

Case No. 4:16-CV-82-WTM-GRS

SOLOMAN OLUDAMISI AJIBADE and ADENIKE HANNAH AJIBADE,
as natural parents of Mathew Ajibade, and THE ESTATE
OF MATHEW AJIBADE and Chris Oladapo, its Executor,

Plaintiffs,

vs.

JOHN WILCHER, in his official capacity as Chatham
County Sheriff, et al.,

Defendants.

VIDEOTAPED DEPOSITION OF
DR. STACEY DESAMOURS

Decatur, Georgia

Friday, March 31, 2017

Court Reporter: Michelle M. Boudreaux, RPR

Dr. Stacey Desamours

Page 2

1

2

3

4

5

6

March 31, 2017

7

1:10 p.m.

8

9

10

Videotaped deposition of

11

DR. STACEY DESAMOURS, held at the Georgia

12

Bureau of Investigation, Medical Examiner's

13

Office, 3121 Panthersville Road, Decatur,

14

Georgia, pursuant to Agreement before

15

Michelle M. Boudreaux, a Registered

16

Professional Reporter in the State of

17

Georgia.

18

19

20

21

22

23

24

Dr. Stacey Desamours

Page 3

1 APPEARANCES OF COUNSEL

2

3 On behalf of the Plaintiffs:

4 TROY A. RAFFERTY, Esq.
5 WILLIAM F. CASH III, Esq.
6 Levin Papantonio Thomas Mitchell
7 Rafferty & Proctor, P.A.
8 316 South Baylen Street
9 Suite 600
10 Pensacola, Florida 32502
11 850.435.7043
12 trafferty@levinlaw.com
13 bcash@levinlaw.com

14 On behalf of Defendants Corizon Health and Gregory
15 Brown:

16 EMILY C. WARD, Esq.
17 Carlock, Copeland & Stair, LLP
18 191 Peachtree Street, NE
19 Suite 3600
20 Atlanta, Georgia 30303-1740
21 404.522.8220
22 eward@carlockcopeland.com

23 On behalf of Defendants Sheriff John Wilcher and the
24 Chatham County Detention Center:

25 R. JONATHAN HART, Esq.
26 Chatham County Attorneys Office
27 124 Bull Street
28 Suite 240
29 Savannah, Georgia 31401
30 912.652.7881

31

32

33

34

Dr. Stacey Desamours

Page 4

1 APPEARANCES OF COUNSEL (Cont'd)

2

3 On behalf of Defendants Andreux Evans-Martinez and
4 Debra Johnson:

5

LAUREN E. H. MEADOWS, Esq.

6

Oliver Maner LLP

7

218 West State Street

8

Savannah, Georgia 31412

9

912.236.3311

10

lmeadows@olivermaner.com

11

Also Present: Thomas Withers, Esq. (via telephone)

12

Videographer: Bill Roach

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

Dr. Stacey Desamours

Page 34

1 flow to the heart, and that can predispose the heart to
2 ischemia, or lack of blood flow. And that, too, can
3 produce a cardiac arrhythmia.

4 So it's kind of a yin-yang response with
5 epinephrine with our -- with our adrenaline. And for
6 some people, with an exaggerated stress response, they
7 can die from that.

8 Q And are these the type of things that we
9 just -- that I just described in terms of being
10 restrained, having a spit mask over your head, being
11 unattended for an hour and a half, being -- suffering
12 those physical injuries, and being tased, all of those
13 things, are those the things that can cause that
14 particular release of catecholamines?

15 A Yes.

16 Q Okay. And that's what your opinion is is
17 what happened in this particular case, correct?

18 A Yes.

19 Q And those particular things that I just
20 mentioned combined to ultimately cause a sudden cardiac
21 death of Mr. Ajibade, correct?

22 A Yes.

23 Q Okay. And do you hold the opinions that I'm
24 asking you -- I should have phrased it to make sure,

Dr. Stacey Desamours

Page 35

1 but all of the opinions that you've been giving here
2 today, have those been held by you to a reasonable
3 degree of medical probability?

4 A Yes.

5 Q Is this -- if someone is having what you just
6 described, the difficulty with the heart -- the heart
7 rate and heart -- the beating of the heart, could that
8 also give them the feeling of not being able to
9 breathe?

10 A Yes.

11 Q Okay. Can you describe that, how that is?

12 A So the feeling of, quote, not being able to
13 breathe can come from different things, usually from
14 the lungs itself, if something is obstructing your
15 ability to breathe or your exchange of oxygen somehow
16 in your body, but it can also come from the heart.
17 And, again, if your heart isn't pumping effectively,
18 you're having a cardiac arrhythmia, you're going to
19 decrease blood flow to your lungs, and that's going to
20 translate into a feeling of shortness of breath, you
21 can't catch your breath, you're not getting enough
22 oxygen into your body.

23 Q Okay. So in your report, when you talk about
24 the fact that he had the spit mask on and an asphyxial